



*Frank O'Bannon*  
Governor

*Lori F. Kaplan*  
Commissioner

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.state.in.us/idem](http://www.state.in.us/idem)

## **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) AND NEW SOURCE REVIEW OFFICE OF AIR QUALITY**

**Murphy Oil USA, Inc.  
Intersection of County Roads 975 & 1050  
Seymour, Indiana 47274**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F071-15227-00040	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 18, 2002  Expiration Date: April 18, 2007

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary operation of a bulk petroleum product storage and transfer terminal.

Authorized individual:	John Laing
Source Address:	Intersection of County Roads 975 & 1050, Seymour, IN 47274
Mailing Address:	1306 Ingram Avenue, Tampa, FL 33605
SIC Code:	5171
Source Location Status:	Jackson
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) internal floating roof gasoline storage tank (ID Tank No. 60-1), with a maximum storage capacity of 2,520,000 gallons, exhausting at one emission point identified as 60-1 (to be constructed in 2002).
- (b) One (1) internal floating roof gasoline storage tank (ID Tank No. 30-1), with a maximum storage capacity of 1,260,000 gallons, exhausting at one emission point identified as 30-1 (to be constructed in 2002).
- (c) One (1) internal floating roof ethanol storage tank (ID Tank No. E-1), with a maximum storage capacity of 84,000 gallons, exhausting at one emission point identified as E-1 (to be constructed in 2002).
- (d) One (1) vertical fixed roof jet kerosene storage tank (ID Tank No. 30-2), with a maximum storage capacity of 1,260,000 gallons, exhausting at one emission point identified as 30-2 (to be constructed in 2002).
- (e) One (1) vertical fixed roof diesel fuel storage tank (ID Tank No. 30-3), with a maximum storage capacity of 1,260,000 gallons, exhausting at one emission point identified as 30-3 (to be constructed in 2002).
- (f) One (1) vertical fixed roof wastewater storage tank (ID Tank No. WW-1), with a maximum storage capacity of 15,000 gallons, exhausting at one emission point identified as WW-1 (to be constructed in 2002).
- (g) One (1) vertical fixed roof fuel additive storage tank (ID Tank No. A-1, with a maximum storage capacity of 8,000 gallons, exhausting at one emission point identified as A-1 (to be constructed in 2002).

- (h) One (1) vertical fixed roof tank red dye additive storage tank (ID Tank No. A-2), with a maximum storage capacity of 2,000 gallons, exhausting at one emission point identified as A-2 (to be constructed in 2002).
- (i) One (1) tank truck loading rack (identified as Loading Rack) used to load gasoline, diesel, jet kerosene, ethanol, and additive, with two loading bays each equipped with four loading arms, controlled by one (1) natural gas fired Vapor Combustion Unit (VCU), and exhausting through one (1) stack identified as VCU (to be constructed in 2002).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Paved and unpaved roads and parking lots with public access.
- (b) Fugitive VOC emissions from pumps, valves, flanges, etc.
- (c) One (1) aboveground oil/water separator, identified as O/W separator, with maximum throughput of 870,000 gallons per year.
- (d) One (1) pressurized butane storage tank, identified as B-1, with maximum storage capacity of 60,000 gallons and storing butane under a pressure of approximately 125 pounds per square inch (psi).  
*Note: The U.S. EPA AP-42 (Section 7.1.1.6) states that tanks operating under a gauge pressure of greater than 15 psi can be operated with virtually no evaporative or working losses. Therefore, it is assumed that there will be no measurable VOC emissions from the butane tank. This unit can, therefore, be listed as an insignificant activity.*

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## **SECTION B                      GENERAL CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### **B.2      Definitions [326 IAC 2-8-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### **B.3      Permit Term [326 IAC 2-8-4(2)]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### **B.4      Enforceability [326 IAC 2-8-6]**

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5      Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6      Severability [326 IAC 2-8-4(4)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7      Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8      Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]**

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:



Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ , may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ , by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.



## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

**C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.



## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) internal floating roof gasoline storage tank (ID Tank No. 60-1), with a maximum storage capacity of 2,520,000 gallons, exhausting at one emission point identified as 60-1 (to be constructed in 2002).
- (b) One (1) internal floating roof gasoline storage tank (ID Tank No. 30-1), with a maximum storage capacity of 1,260,000 gallons, exhausting at one emission point identified as 30-1 (to be constructed in 2002).
- (c) One (1) internal floating roof ethanol storage tank (ID Tank No. E-1), with a maximum storage capacity of 84,000 gallons, exhausting at one emission point identified as E-1 (to be constructed in 2002).
- (d) One (1) vertical fixed roof jet kerosene storage tank (ID Tank No. 30-2), with a maximum storage capacity of 1,260,000 gallons, exhausting at one emission point identified as 30-2 (to be constructed in 2002).
- (e) One (1) vertical fixed roof diesel fuel storage tank (ID Tank No. 30-3), with a maximum storage capacity of 1,260,000 gallons, exhausting at one emission point identified as 30-3 (to be constructed in 2002).
- (f) One (1) vertical fixed roof wastewater storage tank (ID Tank No. WW-1), with a maximum storage capacity of 15,000 gallons, exhausting at one emission point identified as WW-1 (to be constructed in 2002).
- (g) One (1) vertical fixed roof fuel additive storage tank (ID Tank No. A-1), with a maximum storage capacity of 8,000 gallons, exhausting at one emission point identified as A-1 (to be constructed in 2002).
- (h) One (1) vertical fixed roof tank red dye additive storage tank (ID Tank No. A-2), with a maximum storage capacity of 2,000 gallons, exhausting at one emission point identified as A-2 (to be constructed in 2002).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

### Construction Conditions

#### General Construction Conditions

- D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### Effective Date of the Permit

- D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.1.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

- D.1.4 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAQ may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of (1) one year or more.

### Operation Conditions

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)] [326 IAC 2-2]

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(a) Pursuant to 326 IAC 2-8, the total throughputs of gasoline, diesel fuel, jet kerosene ethanol, butane, fuel additive, and red dye additive to the storage tanks at the source shall each be limited to:

- (1) 219,240,000 gallons of gasoline,
- (2) 73,080,000 gallons of diesel fuel,
- (3) 73,080,000 gallons of jet kerosene,
- (4) 26,738,000 gallons of ethanol,
- (5) 21,390,000 gallons of butane,
- (6) 49,000 gallons of fuel additive, and
- (7) 5,000 gallons of red dye additive

per twelve (12) month period, rolled on a monthly basis.

- (b) The above throughput limits shall limit the total potential to emit of volatile organic compounds (VOC), single HAP, and total HAP emissions from the storage tanks to 9.26, 0.62, and 1.31 tons per year, respectively. Compliance with this limit in conjunction with the requirements of Conditions D.2.5 and D.3.1, shall limit source wide emissions of VOC, worst case single HAP, and total HAPs to less than 100, 10, and 25 tons per twelve (12) month period, rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7, 326 IAC 2-2, 40 CFR 52.21 and 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

- D.1.6 General Provisions Relating to NSPS [326 IAC 12-1-1] [40 CFR Part 60, Subpart A] [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

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The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated as 326 IAC 12-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Kb.

- D.1.7 Volatile Organic Liquid Storage Vessels NSPS [326 IAC 12] [40 CFR Part 60, Subpart Kb]

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The provisions of 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including petroleum liquid tanks) for which construction, reconstruction, or modification commenced after July 23, 1984, which are incorporated by reference as 326 IAC 12, apply to tanks 60-1, 30-1 and E-1. A copy of this rule is attached. The Permittee shall comply with the requirements of this rule upon startup of the gasoline distribution facility.

D.1.8 Standards for Volatile Organic Compounds Emissions from Storage Vessels [40 CFR 60.112b] [Subpart Kb] [326 IAC 12]

Pursuant to 326 IAC 12 and 40 CFR 60.112b, the Permittee shall equip tanks 60-1, 30-1 and E-1 with a fixed roof in combination with an internal floating roof meeting the following specifications:

- (a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a tank that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the tank is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- (b) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the tank and the edge of the internal floating roof:
  - (1) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the tank and the floating roof continuously around the circumference of the tank.
  - (2) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the tank and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - (3) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the tank by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- (c) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- (d) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- (e) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- (f) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- (g) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- (h) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

- (i) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

#### D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-4-3]

Pursuant to 326 IAC 8-4-3, Tank Nos. 60-1 and 30-1 are subject to the following:

- (a) The facility must be retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.
- (b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.
- (c) All openings, except stub drains, are equipped with covers, lids, or seals such that:
  - (1) the cover, lid, or seal is in the closed position at all times except when in actual use;
  - (2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
  - (3) rim vents, if provided are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

#### D.1.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the storage tanks identified as 60-1, 30-1 and E-1 and any control devices.

### **Compliance Determination Requirements**

#### D.1.11 Performance Testing [40 CFR 60.113b] [326 IAC 12]

The Permittee of each tank (ID 60-1, 30-1, and E-1) as specified in 40 CFR 60.112b(a), shall meet the following requirements. The applicable paragraph for a particular tank depends on the control equipment installed to meet the requirements of 40 CFR 60.112b.

After installing the control equipment required to meet 40 CFR 60.112b(a)(1) (permanently affixed roof and internal floating roof), each Permittee shall:

- (a) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the tank with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling the tank.
- (b) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the tank, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the tank from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

- (c) For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B):
  - (1) Visually inspect the vessel as specified in paragraph (a)(4) of this section at least every 5 years; or
  - (2) Visually inspect the vessel as specified in paragraph (a)(2) of this section.
- (d) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the tank is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the tank with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) and (a)(3)(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of this section.
- (e) Notify the Administrator in writing at least 30 days prior to the filling or refilling of each tank for which an inspection is required by paragraphs (a)(1) and (a)(4) of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of this section is not planned and the Permittee could not have known about the inspection 30 days in advance or refilling the tank, the Permittee shall notify the Administrator at least 7 days prior to the refilling of the tank. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.12 Monitoring of Storage Vessels [40 CFR 60.116b] [326 IAC 12]**

Pursuant to 40 CFR 60.116b, The Permittee shall comply with the applicable compliance monitoring requirements specified below for tanks identified as 60-1, 30-1 and E-1

- (a) The Permittee shall keep copies of all records required by this section, except for the record required by paragraph (b) of this section, for at least 2 years. The record required by paragraph (b) of this section will be kept for the life of the source.
- (b) The Permittee of each tank as specified in 40 CFR 60.110b(a) shall keep readily accessible records showing the dimension of the tank and an analysis showing the capacity of the tank.
- (c) The Permittee of each tank shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

- (d) The Permittee of each tank either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.
- (e) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined in 40 CFR 60.116b(e).
- (f) The permittee of each tank equipped with a closed vent system and control device meeting the specifications of 40 CFR 60.112b is exempt from the requirements of paragraphs (b) and (c) above.

The Permittee shall comply with the monitoring requirements in 40 CFR 60.116b, except records shall be kept for at least 5 years.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.1.13 Record Keeping and Reporting [40 CFR 60.115b] [326 IAC 12]**

The Permittee of tanks 60-1, 30-1 and E-1 as specified in 40 CFR 60.112b(a) shall keep records and furnish reports as required by paragraphs (a), (b), or (c) of this section depending upon the control equipment installed to meet the requirements of 40 CFR 60.112b. The Permittee shall keep copies of all reports and records required by this section, except for the record required by (c)(1), for at least 2 years. The record required by (c)(1) will be kept for the life of the control equipment.

- (a) After installing control equipment in accordance with 40 CFR 60.112b(a)(1) (fixed roof and internal floating roof), the Permittee shall meet the following requirements.
  - (1) Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a)(1) and 40 CFR 60.113b(a)(1). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3).
  - (2) Keep a record of each inspection performed as required by 40 CFR 60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the tank on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
  - (3) If any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the tank, the nature of the defects, and the date the tank was emptied or the nature of and date the repair was made.
  - (4) After each inspection required by 40 CFR 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the tank and the reason it did not meet the specifications of 40 CFR 61.112b(a)(1) or 40 CFR 60.113b(a)(3) and list each repair made.

Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), storage tanks identified as 30-2, 30-3, WW-1, A-1 and A-2 are subject to following record keeping requirements.

- (a) The Permittee shall maintain permanent records at the source in accordance with (1) through (2) below:
  - (1) the dimension of the storage vessel;
  - (2) an analysis showing the capacity of the storage vessel; and
  - (3) vapor pressure of each organic liquid stored in tanks 30-2 and 30-3.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 VOC Record Keeping Requirements [326 IAC 8-4-3] [40 CFR 60.115b] [326 IAC 12]

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.5.
  - (1) The throughputs of gasoline, diesel fuel, jet kerosene, ethanol, butane, fuel additive, and red dye additive through each tank for each month. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of lading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred;
  - (2) The total throughputs of gasoline, diesel fuel, jet kerosene, ethanol, butane, fuel additive, and red dye additive through all seven (7) tanks per month;
  - (3) A log of the dates for each throughput of gasoline, diesel fuel, jet kerosene, ethanol, butane, fuel additive, and red dye additive for each tank;
  - (4) The 12 month rolling total throughputs of gasoline, diesel fuel, jet kerosene, ethanol, butane, fuel additive, and red dye additive through all seven (7) tanks;
  - (5) the types of volatile liquid stored; and
  - (6) the maximum true vapor pressure of the liquid as stored.
- (b) To document compliance with Conditions D.1.12, the Permittee shall maintain records as specified in condition D.1.12 fulfilling the requirements for monitoring of storage vessels.
- (c) The Permittee shall comply with the record keeping requirements of 326 IAC 8-4-3. The following records are required for tanks 60-1 and 30-1:
  - (1) The types of volatile petroleum liquids stored,
  - (2) The maximum true vapor pressure of the liquids stored, and
  - (3) The results of the inspections performed on the tanks.

Such records will be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.15 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (i) One (1) tank truck loading rack (identified as Loading Rack) used to load gasoline, diesel, jet kerosene, ethanol, and additive, with two loading bays each equipped with four loading arms, controlled by one (1) natural gas fired Vapor Combustion Unit (VCU), and exhausting through one (1) stack identified as VCU (to be constructed in 2002).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

### Construction Conditions

#### General Construction Conditions

- D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### Effective Date of the Permit

- D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.2.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.
- D.2.4 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAQ may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of (1) one year or more.

### Operation Conditions

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8, the loading of gasoline, diesel fuel, jet kerosene ethanol, butane, fuel additive, and red dye additive through the truck loading rack is limited to:

- (1) 219,240,000 gallons of gasoline,
- (2) 73,080,000 gallons of diesel fuel,
- (3) 73,080,000 gallons of jet kerosene,
- (4) 26,738,000 gallons of ethanol,
- (5) 21,390,000 gallons of butane,
- (6) 49,000 gallons of fuel additive, and
- (7) 5,000 gallons of red dye additive

per twelve (12) month period, rolled on a monthly basis.

- (b) The above throughput limits and the use of the Vapor Combustion Unit (VCU) with overall VOC control efficiency of 98.2% shall limit the total potential to emit of volatile organic compounds (VOC), single HAP, and total HAP emissions from the truck loading rack to 86.28, 2.70, and 6.57 tons per year, respectively. Compliance with this limit in conjunction with the requirements of Conditions D.1.5 and D.3.1, shall limit source wide emissions of VOC, worst case single HAP, and total HAPs to less than 100, 10, and 25 tons per twelve (12) month period, rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7, 326 IAC 2-2, 40 CFR 52.21 and 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.500, Subpart XX]

Pursuant to 40 CFR 60.502, Subpart XX, this rule requires:

- (a) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded, except as noted in paragraph (c) of 40 CFR 60.502.
- (b) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).
- (c) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4, the Permittee shall not permit the loading of gasoline into any transport unless:

- (a) The gasoline loading equipment is equipped with a vapor control system in good working order, which will control VOC emissions to the atmosphere from the equipment being controlled to no more than 80 milligrams per liter of gasoline loaded.
- (b) Displaced vapors and gases are vented only to the vapor control system.
- (c) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- (d) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

If employees of the owner of the source are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the source shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this rule.

Compliance with the VOC emission limit of 35 milligrams of total organic compounds per liter of gasoline loaded, pursuant to 40 CFR 60.502, Subpart XX, shall ensure compliance with the VOC emission limit of 80 milligrams per liter of gasoline loaded.

**D.2.8 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]**

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Pursuant to 326 IAC 8-4-9, the Permittee shall:

- (a) Ensure the following requirements are met, before allowing a gasoline transport subject to this rule to be filled or emptied :
  - (1) The gasoline transport is tested annually according to test procedures consistent with Appendix A of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA-450/2-78-051, or equivalent procedure approved by the commissioner.
  - (2) The gasoline transport sustains a pressure change of no more than seven hundred fifty (750) pascals in five (5) minutes when pressurized to a gauge pressure of four thousand five hundred (4,500) pascals or evacuated to a gauge pressure of one thousand five hundred (1,500) pascals during the testing required in (a) (1).
  - (3) The gasoline transport is repaired by the owner or operator of the transport and retested within fifteen (15) days of testing if it does not meet the criteria of (a) (2).
  - (4) The gasoline transport displays a sticker which shows the date that the gasoline tank truck last passed the test required in (a) (1) through (a) (2). Such sticker shall be displayed near the Department of Transportation Certification Plate required by 49 CFR 178.340-10b.
- (b) The owner of the transport shall be responsible for compliance with subsection (a). The Permittee shall take all reasonable steps to ensure that transports loading at its facility comply with subsection (b), and shall, in all cases when its employees are present to supervise or perform loading, be responsible for compliance with (a)(4).
- (c) The Permittee, which owns and operates a vapor control system subject to this rule shall:
  - (1) Design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
    - (A) gauge pressure from exceeding four thousand five hundred (4,500) pascals and a vacuum from exceeding one thousand five hundred (1,500) pascals in the gasoline tank truck;
    - (B) a reading equal to or greater than one hundred percent (100%) of the lower explosive limit (LEL, measured as propane) at two and five-tenths (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in Appendix B of "Control of Organic Compound leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA 450/2-78-051, or an equivalent procedure approved by IDEM during loading or unloading operations; and
    - (C) avoidable visible liquid leaks during loading or unloading operations.
  - (2) Repair and retest a vapor collection or control system that exceeds the limits in (c) (1) within fifteen (15) days.
- (d) The IDEM, OAQ staff may, at any time monitor a gasoline tank truck, vapor balance referenced, to confirm continuing compliance with subsection (a) or (b).
- (e) If IDEM, OAQ allows alternative test procedures in subsection (a)(1) or (c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.

**D.2.9 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

**Compliance Determination Requirements**

**D.2.10 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.500, Subpart XX]**

Pursuant to 40 CFR 60.502, Subpart XX, this rule requires:

- (a) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.
- (b) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.
- (c) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:
  - (1) The Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the affected facility.
  - (2) The Permittee shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the affected facility within 3 weeks after the loading has occurred.
  - (3) The Permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.
  - (4) Alternate procedures to those described in paragraphs (e)(1) through (5) of 40 CFR 60.502 for limiting gasoline tank truck loadings may be used upon application to, and approval by, the IDEM, OAQ.
- (d) The Permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.
- (e) The Permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.
- (f) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

**D.2.11 Testing Requirements [326 IAC 2-8-5(1)] [40 CFR 60.500, Subpart XX] [326 IAC 12]**

- (a) Immediately before the performance test required to determine compliance with 40 CFR 60.502 (b), (c), and (h), the Permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The Permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.

- (b) During the period between 18 and 24 months after issuance of this permit, the Permittee shall determine compliance with the VOC standards in 40 CFR 60.502 (b) and (c) using the testing procedures pursuant to 40 CFR 60.503 (c)(1) through (7).
- (c) During the period between 18 and 24 months after issuance of this permit, the Permittee shall determine compliance with the standard in 40 CFR 60.502 (h) using the testing procedures pursuant to 40 CFR 60.503 (d)(1) and (2).
- (d) These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.2.12 Volatile Organic Compounds (VOC)**

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The enclosed flame hydrocarbon Vapor Combustion Unit (VCU) for VOC control shall be in operation at all times when the tank truck loading rack (identified as Loading Rack) is in operation and exhausting to the outside atmosphere.

**Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.2.13 Record Keeping Requirements**

- 
- (a) To document compliance with Condition D.2.6 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC emission limits established in Condition D.2.5.
    - (1) The amount of gasoline, diesel fuel, jet kerosene, ethanol, butane, fuel additive, and red dye additive loaded each month. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of lading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred;
    - (2) The total amounts of gasoline, diesel fuel, jet kerosene, ethanol, butane, fuel additive, and red dye additive loaded per month;
    - (3) A log of the dates for loading each product; and
    - (4) The 12 month rolling total amounts of gasoline, diesel fuel, jet kerosene, ethanol, butane, fuel additive, and red dye additive loaded.
  - (b) To document compliance with Condition D.2.6 the Permittee shall maintain records in accordance with (1) and (2) below.
    - (1) The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.
    - (2) The Permittee shall cross-check each tank identification number obtained in paragraph (e)(2) of 40 CFR 60.502 with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.
  - (c) To document compliance with Condition D.2.8 the Permittee shall maintain records in accordance with (1) below.
    - (1) The Permittee shall maintain records of all certification testing and repairs. The records must identify the following:

- (A) The gasoline tank truck, vapor collection system, or vapor control system.
- (B) The date of the test or repair.
- (C) If applicable, the type of repair and the date of retest.

The records must be maintained in a legible, readily available condition for at least two (2) years after the date the testing or repair was completed.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: (Insignificant Activity)

- (a) Paved and unpaved roads and parking lots with public access.
- (b) Fugitive VOC emissions from pumps, valves, flanges, etc.
- (c) One (1) aboveground oil/water separator, identified as O/W separator, with maximum throughput of 870,000 gallons per year.
- (d) One (1) pressurized butane storage tank, identified as B-1, with maximum storage capacity of 60,000 gallons and storing butane under a pressure of approximately 125 pounds per square inch (psi).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.3.1 FESOP Limit [326 IAC 2-8] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8, the oil/water separator maximum throughput shall not exceed 870, 000 gallons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-8, the throughput of butane to the storage tank (B-1) at the source shall be limited to 21,390,000 gallons per twelve (12) consecutive month period (limit also listed under Condition D.1.1).
- (c) Compliance with this limit in conjunction with the requirements of Conditions D.1.5 and D.2.5, shall limit source wide emissions of VOC, worst case single HAP, and total HAPs to less than 100, 10, and 25 tons per twelve (12) month period, rolled on a monthly basis, respectively. Therefore, the requirements of 326 IAC 2-7, 326 IAC 2-2, 40 CFR 52.21 and 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

#### D.3.2 Record Keeping Requirement

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC emission limits established in Condition D.2.1.
  - (1) total monthly throughput through oil/water separator; and
  - (2) total butane throughput per month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Reporting requirement for butane throughput limit is listed in Section D.1.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Murphy Oil USA, Inc.  
Source Address: Intersection of County Roads 975 & 1050, Seymour, IN 47274  
Mailing Address: 1306 Ingram Avenue, Tampa, FL 33605  
FESOP No.: F071-15227-00040

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Murphy Oil USA, Inc.  
Source Address: Intersection of County Roads 975 & 1050, Seymour, IN 47274  
Mailing Address: 1306 Ingram Avenue, Tampa, FL 33605  
FESOP No.: F071-15227-00040

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
    CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
    CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## OFFICE OF AIR QUALITY

### COMPLIANCE DATA SECTION

### FESOP Quarterly Report

Source Name: Murphy Oil USA, Inc.  
Source Address: Intersection of County Roads 975 & 1050, Seymour, IN 47274  
Mailing Address: 1306 Ingram Avenue, Tampa, FL 33605  
FESOP No.: F071-15227-00040  
Facility: Storage Tanks 60-1, 30-1, 30-2, E-1, B-1, A-1 and A-2  
Parameter: VOC  
Limit: The total throughputs of gasoline, diesel fuel, jet kerosene, ethanol, butane, fuel additive and red dye additive to the storage tanks at the source shall each be limited to 219,240,000 gallons of gasoline, 73,080,000 gallons of diesel, 73,080,000 gallons of jet kerosene, 26,738,000 gallons of ethanol, 21,390,000 gallons of butane, 49,000 gallons of fuel additive and 5,000 gallons of red dye additive per twelve (12) month period, rolled on a monthly basis.

YEAR \_\_\_\_\_

Fuel Type	Month: _____			Month: _____			Month: _____		
	Column 1	Column 2	Column 1 +2	Column 1	Column 2	Column 1 +2	Column 1	Column 2	Column 1 +2
	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput
Gasoline									
Diesel Fuel									
Jet kerosene									
Ethanol									
Butane									
Fuel additive									
Red dye additive									

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

Attach a signed certification to complete this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## OFFICE OF AIR QUALITY

### COMPLIANCE DATA SECTION

### FESOP Quarterly Report

Source Name: Murphy Oil USA, Inc.  
Source Address: Intersection of County Roads 975 & 1050, Seymour, IN 47274  
Mailing Address: 1306 Ingram Avenue, Tampa, FL 33605  
FESOP No.: F071-15227-00040  
Facility: Loading Rack  
Parameter: VOC  
Limit: The loading of gasoline, diesel fuel, jet kerosene, ethanol, butane, fuel additive and red dye additive through the loading rack shall each be limited to 219,240,000 gallons of gasoline, 73,080,000 gallons of diesel, 73,080,000 gallons of jet kerosene, 26,738,000 gallons of ethanol, 21,390,000 gallons of butane, 49,000 gallons of fuel additive and 5,000 gallons of red dye additive per twelve (12) month period, rolled on a monthly basis.

YEAR \_\_\_\_\_

Fuel Type	Month: _____			Month: _____			Month: _____		
	Column 1	Column 2	Column 1 +2	Column 1	Column 2	Column 1 +2	Column 1	Column 2	Column 1 +2
	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput	Total Throughput this Month	Total Throughput Previous 11 Months	12 Month Total Throughput
Gasoline									
Diesel Fuel									
Jet kerosene									
Ethanol									
Butane									
Fuel additive									
Red dye additive									

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Murphy Oil USA, Inc.  
Source Address: Intersection of County Roads 975 & 1050, Seymour, IN 47274  
Mailing Address: 1306 Ingram Avenue, Tampa, FL 33605  
FESOP No.: F071-15227-00040  
Facility: Oil/Water Separator  
Parameter: Oil/Water Separator throughput  
Limit: Oil/Water Separator throughput shall not exceed 870,000 gallons per twelve (12) consecutive month period.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Murphy Oil USA, Inc.  
Source Address: Intersection of County Roads 975 & 1050, Seymour, IN 47274  
Mailing Address: 1306 Ingram Avenue, Tampa, FL 33605  
FESOP No.: F071-15227-00040

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

  

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

  

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

Addendum to the  
Technical Support Document (TSD) for a Federally Enforceable Operating  
Permit (FESOP) and New Source Review

**Source Name:** Murphy Oil USA, Inc.  
**Source Location:** Intersection of County Roads 975 & 1050, Seymour, IN 47274  
**County:** Jackson  
**SIC Code:** 5171  
**Operation Permit No.:** F071-15227-00040  
**Permit Reviewer:** Adeel Yousuf / EVP

On March 14, 2002, the Office of Air Quality (OAQ) had a notice published in the Seymour Daily Tribune, Seymour, Indiana, stating that Murphy Oil USA, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) relating to the operation of a bulk petroleum product storage and transfer terminal. The notice also stated that OAQ proposed to issue a FESOP Permit for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

No comments were received from the source or other interested parties. However, upon further review, the OAQ has decided to make the following revisions to the permit (new language is bolded, deleted language is in strikeout):

1. The source ID (071-03181) listed in the FESOP permit has been replaced with the correct source ID, which is 071-00040. Correct source ID has been added to the title page, header, FESOP Certification, FESOP Quarterly Report, FESOP Emergency Report and FESOP Quarterly Deviation & Compliance Monitoring Report.



## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) and New Source Review**

#### **Source Background and Description**

**Source Name:** Murphy Oil USA, Inc.  
**Source Location:** Intersection of County Roads 975 & 1050, Seymour, IN 47274  
**County:** Jackson  
**SIC Code:** 5171  
**Operation Permit No.:** F071-15227-00040  
**Permit Reviewer:** Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP application from Murphy Oil USA, Inc. relating to the operation of a bulk petroleum product storage and transfer terminal.

#### **Permitted Emission Units and Pollution Control Equipment**

This is a first time approval and no previous permits, registrations, modifications or exemptions have been issued to the source.

#### **New Emission Units and Pollution Control Equipment**

The application includes information relating to the approval for the construction and operation of the following equipment:

- (a) One (1) internal floating roof gasoline storage tank (ID Tank No. 60-1), with a maximum storage capacity of 2,520,000 gallons, exhausting at one emission point identified as 60-1 (to be constructed in 2002).
- (b) One (1) internal floating roof gasoline storage tank (ID Tank No. 30-1), with a maximum storage capacity of 1,260,000 gallons, exhausting at one emission point identified as 30-1 (to be constructed in 2002).
- (c) One (1) internal floating roof ethanol storage tank (ID Tank No. E-1), with a maximum storage capacity of 84,000 gallons, exhausting at one emission point identified as E-1 (to be constructed in 2002).
- (d) One (1) vertical fixed roof jet kerosene storage tank (ID Tank No. 30-2), with a maximum storage capacity of 1,260,000 gallons, exhausting at one emission point identified as 30-2 (to be constructed in 2002).
- (e) One (1) vertical fixed roof diesel fuel storage tank (ID Tank No. 30-3), with a maximum storage capacity of 1,260,000 gallons, exhausting at one emission point identified as 30-3 (to be constructed in 2002).

- (f) One (1) vertical fixed roof wastewater storage tank (ID Tank No. WW-1), with a maximum storage capacity of 15,000 gallons, exhausting at one emission point identified as WW-1 (to be constructed in 2002).
- (g) One (1) vertical fixed roof fuel additive storage tank (ID Tank No. A-1, with a maximum storage capacity of 8,000 gallons, exhausting at one emission point identified as A-1 (to be constructed in 2002).
- (h) One (1) vertical fixed roof tank red dye additive storage tank (ID Tank No. A-2), with a maximum storage capacity of 2,000 gallons, exhausting at one emission point identified as A-2 (to be constructed in 2002).
- (i) One (1) tank truck loading rack (identified as Loading Rack) used to load gasoline, diesel, jet kerosene, ethanol, and additive, with two loading bays each equipped with four loading arms, controlled by one (1) natural gas fired Vapor Combustion Unit (VCU), and exhausting through one (1) stack identified as VCU (to be constructed in 2002).

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Paved and unpaved roads and parking lots with public access.
- (b) Fugitive VOC emissions from pumps, valves, flanges, etc.
- (c) One (1) aboveground oil/water separator, identified as O/W separator, with maximum throughput of 870,000 gallons per year.
- (d) One (1) pressurized butane storage tank, identified as B-1, with maximum storage capacity of 60,000 gallons and storing butane under a pressure of approximately 125 pounds per square inch (psi).  
*Note: The U.S. EPA AP-42 (Section 7.1.1.6) states that tanks operating under a gauge pressure of greater than 15 psi can be operated with virtually no evaporative or working losses. Therefore, it is assumed that there will be no measurable VOC emissions from the butane tank. This unit is listed as an insignificant activity.*

### **Existing Approvals**

This new source has no existing approvals.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on November 29, 2001.

There was no notice of completeness letter mailed to the source.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 11).

## Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Benzene	less than 10
Cresols	less than 10
Cumene	less than 10
Ethylbenzene	less than 10
Hexane	greater than 10
MTBE	less than 10
Naphthalene	less than 10
Phenol	less than 10
Styrene	less than 10
Toluene	less than 10
Xylene	less than 10
2,2,4-Trimethylpentane	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Limited Potential To Emit

- (a) The source has accepted a federally enforceable limit on potential to emit VOCs of less than 100 tons per year, consisting of:
- (i) 95.54 tons per year for the significant activities; and
  - (ii) 2.49 tons per year for the insignificant activities.
- (b) The source has accepted a limit on potential to emit of less than 10.0 tons per year for any single HAP and less than 25.0 tons per year for any combination of HAPs.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited PTE (tons/year)							
Process/ facility	PM	PM-10	SO <sub>2</sub>	VOC*	CO	NO <sub>x</sub>	Single HAP	HAPs
Storage Tanks	0.00	0.00	0.00	9.26	0.00	0.00	0.62	1.31
Truck Loading Rack	0.21	0.21	0.91	86.28	17.27	6.91	2.70	6.57
Insignificant Activities	0.31	0.06	0.00	2.49	0.00	0.00	0.54	1.02
Total Emissions	0.52	0.27	0.91	98.03	17.27	6.91	3.86	8.90

\*Limited VOC emissions are based on annual limited throughputs of gasoline, diesel fuel, jet kerosene, ethanol, butane, fuel additive, and red dye additive of 219,240,000; 73,080,000; 73,080,000; 26,738,000; 21,390,000; 49,000; and 5,000 gallons, respectively.

### County Attainment Status

The source is located in Jackson County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jackson County has been designated as attainment or unclassifiable for ozone.

## Federal Rule Applicability

- (a) Storage tanks identified as 60-1, 30-1, and E-1 (all constructed in 2002), are subject to the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60.112b, Subpart Kb (Volatile Organic Liquid Storage Vessels), because the tanks are being constructed after the rule applicability date of July 23, 1984, each has a storage capacity of greater than 151 m<sup>3</sup> (39,890 gallons) and store volatile organic liquid with a maximum true vapor pressure of greater than 3.5 kPa.

Pursuant to 40 CFR 60.112b, the following shall apply:

- (1) the owner or operator of shall equip each tank with one (1) of the following:
- (i) A fixed roof in combination with an internal floating roof meeting the following specifications:
- (A) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- (B) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
- (I) A foam or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid mounted seal means a foam - or liquid filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
- (II) Two seals mounted one above the others so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor mounted, but both must be continuous.
- (C) Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- (D) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- (E) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- (F) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

- (G) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
  - (H) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
  - (I) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- (ii) An external floating roof. An external floating roof means a pontoon-type or double-deck type cover that rests on the liquid surface in a vessel with no fixed roof. Each external floating roof must meet the following specifications:
- (A) Each external floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal.
    - (I) The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. Except as provided in 40 CFR 60.113b(b)(4), the seal shall completely cover the annular space between the edge of the floating roof and tank wall.
    - (II) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as allowed in 40 CFR 60.113b(b)(4).
  - (B) The roof shall be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.
- (iii) A closed vent system and control device meeting the following specifications:
- (A) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, subpart VV, 40 CFR 60.485(b).
  - (B) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (40 CFR 60.18) of the General Provisions.
- (iv) A system equivalent to those described in paragraphs (i)(A), (i)(B), or (i)(C) above as provided in 40 CFR 60.114b.
- (2) The testing procedures are required under 40 CFR 60.113b. The record keeping and reporting are required under 40 CFR 60.115b.

Tanks 60-1, 30-1 and E-1 all have cone-shaped fixed roofs and welded internal floating roof decks with mechanical shoe rim seals. Therefore, the tanks comply with the requirements of 40 CFR 60, Subpart Kb.

- (b) Storage tanks identified as 30-2 and 30-3 (both constructed in 2002) are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart Kb) where construction, reconstruction, or modification commenced after July 23, 1984. Each tank has storage capacity of greater than 151 cubic meters ( $m^3$ ) (39,889 gallons) and store jet kerosene and diesel fuel, respectively, with a maximum true vapor pressure less than 3.5 kPa, therefore, pursuant to 40 CFR 60.110b(c), these tanks are exempt from all other provisions of this Subpart except 60.116b, which requires that permanent records be maintained showing dimensions and an analysis of the capacities of each tank.
- (c) Storage tank identified as WW-1, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart Kb) where construction, reconstruction, or modification commenced after July 23, 1984. Tank WW-1 has storage capacity of greater than 40 cubic meters ( $m^3$ ) (10,567 gallons) and less than 75  $m^3$  (19,813 gallons), therefore, pursuant to 40 CFR 60.110b(b), this tank is exempt from all other provisions of this Subpart except 60.116b, which requires that permanent records be maintained showing dimensions and an analysis of the capacities of each tank.
- (d) Storage tanks identified as A-1 and A-2 (both constructed in 2002) are not subject to the requirements of 326 IAC 12, (40 CFR Part 60.110, Subpart Kb) since each have capacities of less than 40 cubic meters ( $m^3$ ) (10,567 gallons), and are therefore not subject to this rule.
- (e) High pressure propane gas storage tank identified as B-1 (constructed in 2002) is not subject to the requirements of 326 IAC 12, (40 CFR Part 60.110, Subpart Kb) because the tank does not store any volatile organic liquid.

According to the U.S. EPA AP-42 (Section 7.1.1.6), tanks operating under a gauge pressure of greater than 15 psi can be operated with virtually no evaporative or working losses.

The pressurized bullet tank (B-1) at the source will only store butane at a pressure of about 125 psi, well above the 15 psig pressure indicated in the AP-42 as a "high pressure" tank. It is therefore determined that the tank will not be emitting any VOC or HAP, and can be classified as an insignificant activity.

- (f) The existing loading rack (identified as Loading Rack) and vapor combustion unit (VCU) are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX) "Standards of Performance for Bulk Gasoline Terminals" because the loading rack is being constructed after December 17, 1980. Pursuant to XX, this rule requires:
  - (a) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.
  - (b) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded, except as noted in paragraph (c) of 40 CFR 60.502.

- (c) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.
- (d) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:
  - (1) The Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the affected facility.
  - (2) The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.
  - (3) The Permittee shall cross-check each tank identification number obtained in paragraph (e)(2) of 40 CFR 60.502 with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.
  - (4) The Permittee shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the affected facility within 3 weeks after the loading has occurred.
  - (5) The Permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.
  - (6) Alternate procedures to those described in paragraphs (e)(1) through (5) of 40 CFR 60.502 for limiting gasoline tank truck loadings may be used upon application to, and approval by, the IDEM, OAQ.
- (e) The Permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.
- (f) The Permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.
- (g) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).
- (h) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).
- (i) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

The source will comply with the requirements of Subpart XX by utilizing a vapor combustion unit to control total organic compound emissions to 35 milligrams per liter of gasoline loaded. Records will also be maintained as required.



- (g) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.420, Subpart R), because the source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively by limiting the annual fuel throughput.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration)**

The petroleum storage and transfer units at this source have a total storage capacity of less than 300,000 barrels. This source is not subject to the requirements of 326 IAC 2-2 because it is not one of the 28 listed source categories and the potential to emit of all regulated pollutants, after controls, are less than 250 tons per year.

##### **326 IAC 2-6 (Emission Reporting)**

This source, which is located in Jackson County, has accepted federally enforceable operation conditions which limit emissions of VOC to below 100 tons per year. The potential to emit of all other regulated pollutants is less than 100 tons per year. Therefore, this source is not subject to 326 IAC 2-6 (Emission Reporting).

##### **326 IAC 5-1 (Visible Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### **State Rule Applicability - Individual Facilities**

##### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because it will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

##### **326 IAC 2-8-4 (FESOP)**

This source is subject to 326 IAC 2-8-4 (FESOP). By accepting the following limitations the source wide volatile organic compound emissions are limited to less than 99.0 tons per year, and the source wide emissions of any single HAP and any combination of HAPs is limited to less than 10 and 25 tons per year, respectively. Therefore the source satisfies the requirements of 326 IAC 2-8 (FESOP) and is not subject to the requirements of 326 IAC 2-7. Therefore, pursuant to this rule, the following conditions apply:

- (a) The total throughput of gasoline to the source shall be limited to 219,240,000 gallons per twelve (12) month period, rolled on a monthly basis.
- (b) The total throughput of diesel fuel to the source shall be limited to 73,080,000 gallons per twelve (12) month period, rolled on a monthly basis.
- (c) The total throughput of jet kerosene to the source shall be limited to 73,080,000 gallons per twelve (12) month period, rolled on a monthly basis.

- (d) The total throughput of ethanol to the source shall be limited to 26,738,000 gallons per twelve (12) month period, rolled on a monthly basis.
- (e) The total throughput of butane to the source shall be limited to 21,390,000 gallons per twelve (12) month period, rolled on a monthly basis.
- (f) The total throughput of fuel additive to the source shall be limited to 49,000 gallons per twelve (12) month period, rolled on a monthly basis.
- (g) The total throughput of red dye additive to the source shall be limited to 5,000 gallons per twelve (12) month period, rolled on a monthly basis.

Compliance with these limits shall limit controlled VOC emissions from the Loading Rack, based on a VOC destruction efficiency of 98.2%, to 86.28 tons per year and makes 326 IAC 2-7 (Part 70 Operating Permit), 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. These limitations shall limit worst case single HAP and combination of HAPs to 3.86 and 8.90 tons per year, respectively and also render the requirements of the NESHAP, 326 IAC 20, 40 CFR Part 63.420, Subpart R not applicable.

#### 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

This source is not subject to 326 IAC 7-1.1 because none of the facilities have a PTE of more than 25 tons per year or 10 lbs per hour of sulfur dioxide. Therefore, pursuant to 326 IAC 7-1.1-1, the requirements of 326 IAC 7-1.1 and 7.2 do not apply.

#### 326 IAC 8-1-6 (New Facilities)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not subject to other provisions of Article 8. This source has a loading rack (identified as Loading Rack) that is constructed after January 1, 1980, with potential uncontrolled VOC emissions in excess of 25 tons per year. However, the loading rack is subject to the requirements of 326 IAC 8-4-4 (Bulk Gasoline Terminals), therefore, this rule does not apply.

#### 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Petroleum liquid storage tanks 60-1 and 30-1 (constructed in 2002), with a capacity greater than 39,000 gallons containing volatile organic liquid whose true vapor pressure is greater than 1.52 pounds per square inch (psi) are subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities). All other storage tanks at the source are not subject to the requirements of 326 IAC 8-4-3. Storage tanks Nos. E-1, 30-2 and 30-3, each store petroleum liquid whose true vapor pressure is less than 1.52 psi and therefore, not subject to the rule. Storage tank Nos. WW-1, A-1 and A-2 have a capacity less than 39,000 gallons, therefore the rule does not apply.

Pursuant to 326 IAC 8-4-3, the Permittee shall maintain records including the following:

- (a) the types of volatile petroleum liquids stored;
- (b) the maximum true vapor pressure; and
- (c) records of the inspections.

Tanks 60-1 and 30-1 each with cone-shaped fixed roofs and welded internal floating roof decks with mechanical shoe rim seals, is in compliance with this rule.

**326 IAC 8-4-4 (Bulk Gasoline Terminals)**

Pursuant to 326 IAC 8-4-1, the loading of gasoline into any transports at this source is subject to the requirements of 326 IAC 8-4-4 (Bulk Gasoline Terminals) because the source is a bulk gasoline terminal (having a FESOP limited daily gasoline throughput of approximately 600,657 gallons per day which is greater than the 20,000 gallons per day threshold to meet the definition of bulk gasoline terminal). The source will comply with the requirements of this rule because the loading rack (identified as Loading Rack) is equipped with an approved control system (Vapor Combustion Unit (VCU)), with a control VOC emission of less than 35 mg/l which meets the required less than 80 mg/l VOC concentration.

**326 IAC 8-4-5 (Bulk Gasoline Plants)**

The source is not subject to the requirements of 326 IAC 8-4-5 (Bulk Gasoline Plants) since the source does not meet the definition of a bulk gasoline plant, which requires a daily gasoline throughput of less than 20,000 gallons per day.

**326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems; Records)**

Pursuant to 326 IAC 8-4-9, sources subject to the requirements of 326 IAC 8-4-4 are also subject to the requirements of 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems; Records). Pursuant to this rule, the source will comply with the requirements of this rule because the loading rack is equipped with a collection system (VCU), which has been demonstrated to have a VOC control efficiency of 98.2%. The source will operate the vapor collection system in accordance with the specified workpractice standards and will maintain the required records associated with the operation of the vapor collection and vapor control systems (VCU).

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

Pursuant to 326 IAC 8-6-1, the requirements of this rule apply to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This petroleum liquid storage operation, constructed in 2002 is not subject to the requirements of 326 8-6 since the source is being constructed after January 1, 1980.

**Compliance Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The tanks identified as No. 60-1 and 30-1 has applicable compliance monitoring conditions as specified below:

The Permittee shall comply with the monitoring requirements in 40 CFR 60.116b for the internal floating roof tanks identified as 60-1 and 30-1 and shall maintain the following records for a minimum of two (2) years. The applicable compliance monitoring conditions are specified below:

- (a) The Permittee shall keep copies of all records required by this section, except for the record required by paragraph (b) below, for at least two (2) years. The record required by paragraph (b) below will be kept for the life of the source.
- (b) The Permittee shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel.
- (c) The Permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
- (d) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.
  - (1) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
  - (2) For crude oil or refined petroleum products the vapor pressure may be obtained by the following:
    - (i) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference-see 40 CFR 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
    - (ii) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
  - (3) For other liquids, the vapor pressure:
    - (i) May be obtained from standard reference texts, or
    - (ii) Determined by ASTM Method D2879-83 (incorporated by reference-see 40 CFR 60.17); or

- (iii) Measured by an appropriate method approved by the Administrator; or
- (iv) Calculated by an appropriate method approved by the Administrator.

These monitoring conditions are necessary because the tanks 60-1 and 30-1 must comply with 40 CFR 60.116b and 326 IAC 2-7 (Part 70).

2. The operation of the loading rack has applicable compliance monitoring conditions as specified below:

- (a) Immediately before the performance test required to determine compliance with 40 CFR 60.502 (b), (c), and (h), the Permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The Permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.
- (b) The Permittee shall determine compliance with the standards in 40 CFR 60.502 (b) and (c) using the testing procedures pursuant to 40 CFR 60.503 (c)(1) through (7).
- (c) The Permittee shall determine compliance with the standard in 40 CFR 60.502 (h) using the testing procedures pursuant to 40 CFR 60.503 (d)(1) and (2).
- (d) The tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection.
- (e) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:
  - (1) Test title: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27.
  - (2) Tank owner and address.
  - (3) Tank identification number.
  - (4) Testing location.
  - (5) Date of test.
  - (6) Tester name and signature.
  - (7) Witnessing inspector, if any: Name, signature, and affiliation.
  - (8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).
- (f) A record of each monthly leak inspection required under 40 CFR 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:
  - (1) Date of inspection.
  - (2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
  - (3) Leak determination method.
  - (4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
  - (5) Inspector name and signature.

- (g) The terminal owner or operator shall keep documentation of all notifications required under 40 CFR 60.502(e)(4) on file at the terminal for at least 2 years.
- (i) The Permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.

These monitoring conditions are necessary because the limits on the tank truck loading rack are needed to ensure compliance with 326 IAC 2-8 (FESOP) and to ensure compliance with 326 IAC 8-4-4 (Bulk Gasoline Terminals) and 40 CFR 60.500, Subpart XX).

## **Conclusion**

The construction and operation of this bulk petroleum product storage and transfer terminal will be subject to the conditions of the attached proposed FESOP No. F071-7564-00004.

### Appendix A: Emission Calculations

**Company Name:** Murphy Oil USA, Inc.  
**Address City IN Zip:** Intersection of County Roads 975 & 1050, Seymour, IN 47274  
**FESOP:** F071-15227-00040  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** February 4, 2002

#### Total Potential To Emit (tons/year)

##### Emissions Generating Activity

Pollutant	Storage Tanks	Loading Rack	Insignificant Activities *	TOTAL
PM	0.00	0.21	0.31	0.52
PM10	0.00	0.21	0.06	0.27
SO2	0.00	0.91	0.00	0.91
NOx	0.00	6.91	0.00	6.91
VOC	9.26	736.00	2.49	747.75
CO	0.00	17.27	0.00	17.27
total HAPs	1.31	78.89**	1.02	58.28
worst case single HAP	0.220 (Hexane)	32.60 (Hexane)**	0.54 (Hexane)	33.36 (Hexane)

Total emissions based on rated capacities at 8,760 hours/year.

\*Insignificant Activity Emissions represent fugitive emissions and emissions from the oil/water separator and VCU pilot combustion.

\*\* HAPs emission rate is calculated based on the maximum VOC emitted before control from the Loading Rack and total HAP content of gasoline (highest emissions).

#### Limited Potential To Emit (tons/year)

##### Emissions Generating Activity

Pollutant	Storage Tanks	Loading Rack	Insignificant Activities *	TOTAL
PM	0.00	0.21	0.31	0.52
PM10	0.00	0.21	0.06	0.27
SO2	0.00	0.91	0.00	0.91
NOx	0.00	6.91	0.00	6.91
VOC	9.26	86.28	2.49	98.03
CO	0.00	17.27	0.00	17.27
total HAPs	1.31	6.57	1.02	8.90
worst case single HAP	0.220 (Hexane)	2.70 (Hexane)	0.54 (Hexane)	3.46 (Hexane)

Total emissions based on rated capacities at 8,760 hours/year.

\*Insignificant Activity Emissions represent fugitive emissions and emissions from the oil/water separator and VCU pilot combustion.

**Appendix A: Emission Calculations  
Tank VOC Emissions - Maximum PTE**

**Company Name: Murphy Oil USA, Inc.**  
**Address City IN Zip: Intersection of County Roads 975 & 1050, Seymour, IN 47274**  
**FESOP: F071-15227-00040**  
**Reviewer: Adeel Yousuf / EVP**  
**Date: February 4, 2002**

Tank ID	Product Stored	Losses (Tons per Year)					Total VOC Tons/yr
		Breathing	Working	Withdraw	Rim Seal	Deck Fitting	
Internal Floating Roof Tanks:							
60-1	Gasoline (RVP 11)	--	--	1.07	0.61	7.20	8.87
30-1	Gasoline (RVP 11)	--	--	1.41	0.44	3.54	5.39
E-1	Ethanol	--	--	0.12	0.03	0.06	0.21
Vertical Fixed Roof Tanks:							
30-2	Jet Kerosene	0.09	0.52	--	--	--	0.62
30-3	Diesel	0.07	0.41	--	--	--	0.48
WW-1	Wastewater	0.001	0.005	--	--	--	0.01
A-1	Fuel Additive	0.0014	0.0011	--	--	--	0.00
A-2	Red Dye Additive	0.0001	0.0000	--	--	--	0.00
Total VOC		0.17	0.94	2.60	1.07	10.80	15.58

Note: All storage tank emissions estimated using USEPA's Tanks 4.0 software program and are based on the estimated maximum annual throughput for each fuel/additive.



**Appendix A: Emission Calculations**  
**Tank VOC Emissions Limited to Loading Throughputs**

**Company Name:** Murphy Oil USA, Inc.  
**Address City IN Zip:** Intersection of County Roads 975 & 1050, Seymour, IN 47274  
**FESOP:** F071-15227-00040  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** February 4, 2002

Tank Number	Product Stored	Losses (Tons per Year)					Total VOC Tons/yr
		Standing	Working	Withdraw	Rim Seal	Deck Fitting	
Internal Floating Roof Tanks:							
60-1	Gasoline (RVP 11)	--	--	0.14	2.17	2.66	4.97
30-1	Gasoline (RVP 11)	--	--	0.09	1.56	1.31	2.97
E-1	Ethanol	--	--	0.12	0.03	0.06	0.21
Vertical Fixed Roof Tanks:							
30-2	Jet Kerosene	0.09	0.52	--	--	--	0.62
30-3	Diesel	0.07	0.41	--	--	--	0.48
WW-1	Wastewater	0.001	0.005	--	--	--	0.01
A-1	Fuel Additive	0.0014	0.0011	--	--	--	0.00
A-2	Red Dye Additive	0.0001	0.0000	--	--	--	0.00
Total VOC		0.17	0.94	0.36	3.76	4.03	9.26

Note: All storage tank emissions estimated using USEPA's Tanks 4.0 software program and are based on the federally enforceable annual throughput limit for each fuel/additive.

**Appendix A: Emission Calculations  
Emissions from Truck Loading Operations**

**Company Name:** Murphy Oil USA, Inc.  
**Address City IN Zip:** Intersection of County Roads 975 & 1050, Seymour, IN 47274  
**FESOP:** F071-15227-00040  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** February 4, 2002

**Uncontrolled VOC Emissions**

Material Loaded	C Maximum Throughput kgal/yr *	D Saturation Factor (S)	E MW lb/lb-mole	F Temperature F	G TVP psi	H AP-42 Emission Factor (lb/kgal) $12.46 \times D \times E \times G / (E + 460)$	Maximum Uncontrolled Loading Losses (tons/yr) $C \times H / 2000$
Gasoline (RVP 11)	219,240	0.6	65	52.00	4.9800	4.7265	518.12
Diesel	73,080	0.6	130	52.00	0.0051	0.0097	0.35
Jet Kerosene	73,080	0.6	130	52.00	0.0065	0.0123	0.45
Ethanol	26,738	0.6	46	52.00	0.4486	0.3018	4.03
Butane	21,390	0.6	58	52.00	23.5200	19.9189	213.03
Red Dye Additive	5	0.6	130	52.00	0.0986	0.1872	4.68E-04
Fuel Additive	49	0.6	130	52.00	0.0750	0.1424	3.49E-03
<b>Total</b>							<b>735.99</b>

Notes:

Emission factor in pounds per thousand gallons loaded, based on AP-42, Table 5.2-1, 5th Ed, 1995.

**Fugitive VOC Emissions**

Material Loaded	A Maximum Throughput kgal/yr *	B Maximum Uncontrolled Loading Losses (tons/yr)	C Capture Efficiency	Limited Fugitive Loading Losses (tons/yr) $B \times (1-C)$
Gasoline (RVP 11)	219,240	518.12	90.00%	51.81
Diesel	73,080	0.35	90.00%	0.04
Jet Kerosene	73,080	0.45	90.00%	0.04
Ethanol	26,738	4.03	90.00%	0.40
Butane	21,390	213.03	90.00%	21.30
Red Dye Additive	5	4.68E-04	90.00%	4.68E-05
Fuel Additive	49	3.49E-03	90.00%	3.49E-04
<b>Total</b>				<b>73.60</b>

\* Throughputs are based on the facility's proposed FESOP limitations

Note: Capture efficiency is assumed to be 90% for tanker trucks required to pass an annual leak test. AP-42; pg. 5.2-6; January 1995.

### Appendix A: Emission Calculations Emissions from Truck Loading Operations

Company Name: Murphy Oil USA, Inc.  
Address City IN Zip: Intersection of County Roads 975 & 1050, Seymour, IN 47274  
FESOP: F071-15227-00040  
Reviewer: Adeel Yousuf / EVP  
Date: February 4, 2002

#### VCU Controlled VOC Emissions

Material Loaded	Maximum Throughput kgal/yr *	VCU Rating (lb/kgal)	Capture Efficiency %	Control Efficiency %	Lim. VCU Emissions (tons/yr)
Gasoline (RVP 11)	219,240	0.0835	90.00%	98.20%	9.15
Diesel	73,080	0.0835	90.00%	98.20%	0.01
Jet Kerosene	73,080	N/A	90.00%	98.20%	0.01
Ethanol	26,738	N/A	90.00%	98.20%	0.07
Butane	21,390	N/A	90.00%	98.20%	3.45
Red Dye Additive	5	N/A	90.00%	98.20%	7.58E-06
Fuel Additive	49	N/A	90.00%	98.20%	5.65E-05
<b>Total</b>					<b>12.68</b>

#### Notes:

\* Throughputs are based on the facility's proposed FESOP limitations.

VCU destruction rating is obtained from specifications provided by John Zink Company for Model No. ACT-3-8-45-X-2/8-2/8.

VCU Emissions from Gasoline Loading (lb/yr) = Gasoline Throughput (kgal/yr) \* VCU Rating (lb/kgal)

VCU Emissions from Diesel, Butane, Ethanol or Additive Loading (lb/yr) = Loading Loss (tons/yr) \* Capture Efficiency \* (1 - Control Efficiency)

Control Efficiency = Uncontrolled Loading Losses (tons/yr) \* VCU Emissions from Gasoline Loading (tons/yr) / Uncontrolled Loading Losses (tons/yr)

#### Total VOC Emissions from Loading Rack

Material Loaded	Limited VCU Emissions (tons/yr)	Lim. Fugitive Loading Losses (tons/yr)	Limited Total (tons/yr)
Gasoline (RVP 11)	9.15	51.81	60.97
Diesel	0.01	0.04	0.04
Jet Kerosene	0.01	0.04	0.05
Ethanol	0.07	0.40	0.47
Butane	3.45	21.30	24.75
Red Dye Additive	7.58E-06	4.68E-05	5.44E-05
Fuel Additive	5.65E-05	3.49E-04	4.05E-04
<b>Total</b>	<b>12.68</b>	<b>73.60</b>	<b>86.28</b>

### Appendix A: Emission Calculations Emissions from Truck Loading Operations

**Company Name:** Murphy Oil USA, Inc.  
**Address City IN Zip:** Intersection of County Roads 975 & 1050, Seymour, IN 47274  
**FESOP:** F071-15227-00040  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** February 4, 2002

#### Total NOx and CO Emissions from the VCU

Pollutant	Emission Factor (lbs/kgal gasoline)	Lim. VCU Emissions (tons/yr)
NOx	0.0334	6.91
CO	0.0835	17.27

Note: VCU emission factors were obtained from specifications provided by John Zink Company for Model No. ZCT-3-8-45-X-2/8-2/8.  
 VCU Emissions (tons/yr) = Gasoline Throughput (kgal/yr) \* VCU emission factor (lb/kgal) \* (1 ton / 2000 lb)

#### Total SO2 Emissions from the VCU

Pollutant	Combusted Material	Total Combusted Emissions (tpy) (a)	Percent Sulfur By Weight %	Total Sulfur Throughput (tpy)	Total SO2 Emissions (tpy) (b)
SO2	Gasoline	457.00	0.10%	0.457	0.91
	Diesel Fuel	0.31	0.50%	1.55E-03	3.10E-03
Total					0.916

Note: (a) Annual combustion rate is determined by finding the difference between loading losses and loading rack VOC emissions for materials passing through the loading racks.  
 (b) It is assumed that all combusted sulfur is oxidized to SO2

#### Total PM/PM10 Emissions from the VCU

Pollutant	Total Combusted Emissions (tpy) (a)	Total Volume Combusted (kgal/yr) (b)	Emission Factors (lb/kgal)	Total PM/PM10 Emissions (tpy) (b)
PM/PM10 (condensable)	457.00	129	1.30	0.08
PM/PM10 (filterable)	457.00	129	2.00	0.13
Total PM/PM10 Emissions (tpy)				0.21

Note: (a) Annual combustion rate is determined by finding the difference between loading losses and loading rack VOC emissions for materials passing through the loading racks.  
 (b) The volume of diesel combusted annually is calculated using a density of 7.105 lb/gal.  
 The emission factor for PM was obtained from AP-42; Table 1.3-2; September 1998.  
 The emission factor for PM10 was obtained from AP-42; Table 1.3-1; September 1998. The emission factor for boilers with heat ratings less than 100 MMBtu/hr was used.

Company Name: **Murphy Oil USA, Inc.**  
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FESOP: **F071-15227-00040**  
Reviewer: **Adeel Yousuf / EVP**  
Date: **February 4, 2002**

**Gasoline**

Pollutant AP to VOC Emission Factor (% by wt.)		Benzene 0.53%	Cresols n/a	Cumene 0.02%	Ethyl Benzene 0.06%	Hexane 4.43%	MTBE 3.52%	Naphthalene n/a	Phenol n/a	Styrene 0.09%	Toluene 0.84%	Xylene 0.24%	2,2,4-Trimethylpentane 0.99%	Total HAPs
	Maximum VOC Emissions (tpy)													
Tank 60-1	4.97	2.63E-02		9.94E-04	2.98E-03	2.20E-01	1.75E-01	0.00E+00		4.47E-03	4.17E-02	1.19E-02	4.92E-02	5.33E-01
Tank 30-1	2.97	1.57E-02		5.94E-04	1.78E-03	1.32E-01	1.05E-01	0.00E+00		2.67E-03	2.49E-02	7.13E-03	2.94E-02	3.18E-01
Fugitive Emissions	0.31	1.64E-03		6.20E-05	1.86E-04	1.37E-02	1.09E-02	0.00E+00		2.79E-04	2.60E-03	7.44E-04	3.07E-03	3.32E-02
Loading Rack	60.97	3.23E-01		1.22E-02	3.66E-02	2.70E+00	2.15E+00	0.00E+00		5.49E-02	5.12E-01	1.46E-01	6.04E-01	6.54E+00
	Total (tpy)	3.67E-01		1.38E-02	4.15E-02	3.07E+00	2.44E+00	0.00E+00		6.23E-02	5.81E-01	1.66E-01	6.85E-01	7.42E+00

**Diesel**

Pollutant AP to VOC Emission Factor (% by wt.)		Benzene 12.38%	Cresols n/a	Cumene 0.37%	Ethyl Benzene 0.38%	Hexane 24.76%	MTBE n/a	Naphthalene n/a	Phenol n/a	Styrene n/a	Toluene 4.36%	Xylene 2.45%	2,2,4-Trimethylpentane 0.28%	Total
	Maximum VOC Emissions (tpy)													
Tank 30-3	0.48	5.94E-02		1.78E-03	1.82E-03	1.19E-01					2.09E-02	1.18E-02	1.34E-03	2.16E-01
Oil/Water Separator	2.18	2.70E-01		8.07E-03	8.28E-03	5.40E-01					9.50E-02	5.34E-02	6.10E-03	9.81E-01
Tank WW-1	5.73E-03	7.09E-04		2.12E-05	2.18E-05	1.42E-03					2.50E-04	1.40E-04	1.60E-05	2.58E-03
Loading Rack	0.04	4.95E-03		1.48E-04	1.52E-04	9.90E-03					1.74E-03	9.80E-04	1.12E-04	1.80E-02
	Total (tpy)	3.35E-01	0.00E+00	1.00E-02	1.03E-02	6.70E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.18E-01	6.63E-02	7.58E-03	1.22E+00

**Jet Kerosene**

Pollutant AP to VOC Emission Factor (% by wt.)		Benzene 2.14%	Cresols 0.004%	Cumene 0.19%	Ethyl Benzene 0.89%	Hexane 22.82%	MTBE n/a	Naphthalene 0.08%	Phenol 0.01%	Styrene n/a	Toluene 6.00%	Xylene 2.91%	2,2,4-Trimethylpentane n/a	Total
	Maximum VOC Emissions (tpy)													
Tank 30-2	0.62	1.33E-02	2.48E-05	1.18E-03	5.52E-03	1.41E-01		4.96E-04	6.20E-05		3.72E-02	1.80E-02		2.17E-01
Loading Rack	0.05	1.07E-03	2.00E-06	9.50E-05	4.45E-04	1.14E-02		4.00E-05	5.00E-06		3.00E-03	1.46E-03		1.75E-02
	Total (tpy)	1.43E-02	2.68E-05	1.27E-03	5.96E-03	1.53E-01		5.36E-04	6.70E-05		4.02E-02	1.95E-02		2.35E-01

**METHODOLOGY**

HAPS emission rate (tons/yr) = Max. VOC emissions (tpy) \* Weight % HAP \* 1 ton/2000 lbs

## HAP Emission Calculations

**Company Name:** Murphy Oil USA, Inc.  
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**FESOP:** F071-15227-00040  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** February 4, 2002

## Red Dye Additive

Pollutant AP to VOC Emission Factor (% by wt.)		Benzene n/a	Cresols n/a	Cumene n/a	Ethyl Benzene n/a	Hexane n/a	MTBE n/a	Naphthalene n/a	Phenol n/a	Styrene n/a	Toluene n/a	Xylene 29.00%	2,2,4-Trimethylpentane n/a	Total
	Maximum VOC Emissions (tpy)													
Tank A-2	1.55E-04											4.50E-05		4.50E-05
Loading Rack	5.42E-05											1.57E-05		1.57E-05
												6.07E-05		6.07E-05

## Fuel Additive

Pollutant AP to VOC Emission Factor (% by wt.)		Benzene n/a	Cresols n/a	Cumene n/a	Ethyl Benzene 1.00%	Hexane n/a	MTBE n/a	Naphthalene n/a	Phenol n/a	Styrene n/a	Toluene n/a	Xylene 10.00%	2,2,4-Trimethylpentane n/a	Total
	Maximum VOC Emissions (tpy)													
Tank A-1	2.53E-03				2.53E-05							2.53E-04		2.78E-04
Loading Rack	4.04E-04				4.04E-06							4.04E-05		4.44E-05
					2.93E-05							2.93E-04		3.23E-04

Total (tpy)	7.16E-01	2.68E-05	2.51E-02	5.78E-02	3.89E+00	2.44E+00	5.36E-04	6.70E-05	6.23E-02	7.40E-01	2.52E-01	6.93E-01	8.87E+00
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**Appendix A: Emissions Calculations  
Combustion Associated HAPs**

**HAPs Emissions**  
**Company Name:** Murphy Oil USA, Inc.  
**Address City IN Zip:** Intersection of County Roads 975 & 1050, Seymour, IN 47274  
**FESOP:** F071-15227-00040  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** February 4, 2002

**Combusted Materials**

Natural Gas (Pilot)	0.47 MMscf/yr
Diesel (a)	182.9 gal/yr

**Diesel Combustion**

Emission Factor in lb/kgal	Benzene 2.1E-04	Dichlorobenzene n/a	Ethylbenzene 6.36E-05	Formaldehyde 3.3E-02	Hexane n/a	Naphthalene 1.13E-03	Trichloroethane 2.36E-04	Toluene 6.20E-03	Xylene 1.1E-04	Total HAPs
Potential Emission in tons/yr	1.957E-05	0.000E+00	5.816E-06	3.018E-03	0.000E+00	1.033E-04	2.158E-05	5.670E-04	9.968E-06	3.745E-03

Emission factors: AP-42, Table 1.3-9; September 1998.

**Natural Gas Combustion**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Ethylbenzene n/a	Formaldehyde 7.5E-02	Hexane 1.8E+00	Naphthalene 6.1E-04	Trichloroethane n/a	Toluene 3.4E-03	Xylene n/a	Total HAPs
Potential Emission in tons/yr	4.935E-07	2.820E-07	0.000E+00	1.763E-05	4.230E-04	1.434E-07	0.00E+00	7.990E-07	0.000E+00	4.423E-04

Emission Factors: AP-42; Table 1.4-3; July 1998.

Total (tpy)	2.006E-05	2.820E-07	5.816E-06	3.035E-03	4.230E-04	1.035E-04	2.158E-05	5.678E-04	9.968E-06	4.19E-03
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Note: (a) All combusted materials from the loading rack are assumed to be diesel due to lack of information regarding HAPs from gasoline combustion. Annual combustion rate is determined by finding the difference between loading losses and loading rack VOC emissions for each material passing through the loading racks.

### Appendix A: Emission Calculations Process Fugitive

**Company Name:** Murphy Oil USA, Inc.  
**Address City IN Zip:** Intersection of County Roads 975 & 1050, Seymour, IN 47274  
**FESOP:** F071-15227-00040  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** February 4, 2002

Component Type	Service	Avg. Emission Factor (lb/hr/unit)	Quantity*	VOC Emissions (lb/hr)	VOC Emissions (tons/yr)
Fittings (connectors, flanges)	Light Liquid	1.76E-05	600	0.011	0.05
Others (compressors, relief valves)	Light Liquid	2.87E-04	25	0.007	0.03
Pumps	Light Liquid	1.19E-03	25	0.030	0.13
Valves	Light Liquid	9.48E-05	250	0.024	0.10
<b>Total</b>				<b>0.07</b>	<b>0.31</b>

Note: Emission factors are taken from: U.S. EPA. Office of Air Quality Planning and Standards. Protocol for Equipment Leak Emission Estimates.  
(Research Triangle Park, NC: U.S. EPA EPA-453/R-95-017, 1995). Table 2-3

**Methodology:**

VOC Emissions (tpy) = Quantity x Emission Factor x (1 ton/ 2000 lb) x (8760 hr / 1 yr)



### Appendix A: Emission Calculations Oil/Water Separator

**Company Name:** Murphy Oil USA, Inc.  
**Address City IN Zip:** Intersection of County Roads 975 & 1050, Seymour, IN 47274  
**FESOP:** F071-15227-00040  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** February 4, 2002

Source Type	Pollutant	Throughput (kgal/yr)	Emission Factor (lb/kgal)	VOC Emissions (tons/yr)
Oil/Water Separator	VOC	870.00	5	2.175
Total				2.175

Note: Emission Factor : AP-42; Table 5.1-2; January 1995.

**Methodology:**

VOC Emssions (tpy) = Throughput x Emission Factor x (1 ton/ 2000 lbs)

### Paved Road Fugitive Emissions

**PM**

Source Type	Annual VMT	% Paved Roads	Emission Factor (lb/VMT)	PM Emissions (tons/yr)
Tanker Trucks	13,595	100%	0.046	0.313
Total				0.313

Note: Paved PM Emission Factor is claculated using AP-42 Section 13.2.1.3, Equation (1). October 1997.

**Methodology:**

PM Emssions (tpy) = Annual VMT x Emission Factor x % Paved Roads x (1 ton/ 2000 lbs)

**PM10**

Source Type	Annual VMT	% Paved Roads	Emission Factor (lb/VMT)	PM10 Emissions (tons/yr)
Tanker Trucks	13,595	100%	0.009	0.061
Total				0.061

Note: Paved PM10 Emission Factor is claculated using AP-42 Section 13.2.1.3, Equation (1). October 1997.

**Methodology:**

PM10 Emssions (tpy) = Annual VMT x Emission Factor x % Paved Roads x (1 ton/ 2000 lbs)